

a position to make the prompt, well-informed decisions necessary to administer a complex funding organization efficiently. Moreover, requiring telecommunications carriers to deal with a multiplicity of state commissions would impose needless burdens on them which, in turn, would be reflected in needlessly inflated rates for consumers.

The Commission has recently reached a similar conclusion in the context of the North American Numbering Plan ("NANP") Administrator. In an April 1994 Notice, the Commission tentatively concluded that the NANP Administrator should be a "single, non-government entity . . . not closely identified with any particular industry segment."<sup>61</sup> The Commission expressly rejected the idea of an organization jointly run by the FCC and the National Association of Regulatory Utility Commissioners ("NARUC") because the many decisionmakers involved would take too much time to reach consensus:

We do not believe it would be practical to establish a joint FCC/NARUC administrative entity at this time to handle number administration within World Zone 1. Even if such an entity were established at NARUC, that association's structure and deliberative processes would be too unwieldy to promptly address the many complex and often time-sensitive issues incident to such administration.<sup>62</sup>

In its July 1995 order, the Commission established the NANP administrator as a single, non-governmental entity.<sup>63</sup> The Commission should reach the same result here and appoint a single,

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<sup>61</sup> Administration of the North American Numbering Plan, Notice of Proposed Rulemaking, 9 FCC Rcd 2068, 2071 (1994).

<sup>62</sup> Id. at 2070 n.20.

<sup>63</sup> Administration of the North American Numbering Plan, FCC 95-283, 1995 FCC LEXIS 4698 at ¶ 57 (released July 13, 1995). Another of the issues addressed by the Commission was whether the NANP administrator and the industry policy board overseeing it should report to the Commission and other NANP member country (continued...)

non-governmental entity to administer the collection and distribution of universal service support funds.

## **VI. CONCLUSION**

For all of the reasons set forth above, ITAA and EMA urge the Commission to define universal service to include voice grade access, touch tone service, single-party service, and access to 911 and operator services. The Commission, however, should not expand the definition of universal service to include unregulated enhanced services. The Commission should also implement the requirement of the 1996 Act that universal service subsidies be made "explicit" by eliminating all subsidies from interstate access charges. All universal service support payments should be collected on an equitable and nondiscriminatory basis from all telecommunications common carriers that provide interstate service. The Commission, however, should not require universal service contributions from private networks or "other providers of

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<sup>63</sup>(...continued)

regulatory bodies, or whether the NANP administrator should report only to the industry policy board. The Commission concluded that it would be more efficient if the NANP administrator only reported to a single industry board, rather than a multitude of foreign government agencies. Id. at ¶ 27.

telecommunications." Finally, the Commission should appoint a single, non-governmental entity to administer the collection and distribution of universal service support funds.

Respectfully submitted,

INFORMATION TECHNOLOGY  
ASSOCIATION OF AMERICA

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A handwritten signature in black ink, appearing to read "Joseph P. Markoski". The signature is fluid and cursive, with the first name "Joseph" and last name "Markoski" being clearly legible.

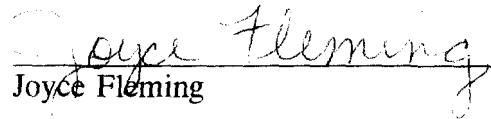
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April 12, 1996

**CERTIFICATE OF SERVICE**

I, Joyce Fleming, hereby certify that copies of the foregoing Joint Comment of The Information Technology Association of America and the Electronic Messaging Association were served by hand or by First-Class United States mail, postage prepaid, upon the parties appearing on the attached service list this 12th day of April, 1996.

  
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